

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

**Bankruptcy Case
No. 08-35653-KRH**

CIRCUIT CITY STORES, INC., et al.,

Chapter 11 (Jointly administered)

Debtors.

**RESPONSE TO THE LIQUIDATING TRUST'S TWENTY-FIRST OMNIBUS
OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN
PARTIALLY INVALID CLAIMS, RECLASSIFICATION OF CERTAIN
MISCLASSIFIED CLAIMS, DISALLOWANCE OF CERTAIN
INVALID CLAIMS, DISALLOWANCE OF CERTAIN LATE FILED
CLAIMS, AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

CC Springs, L.L.C., a Delaware limited liability company ("CC Springs"), appears before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division ("Bankruptcy Court"), in response to the Liquidating Trust's twenty-first objection to landlord claims (reduction of certain partially invalid claims, reclassification of certain misclassified claims, disallowance of certain invalid claims, disallowance of certain late filed claims, disallowance of certain duplicate claims, and disallowance of certain amended claims) (collectively, "the Objection"). The Objection was filed in the Bankruptcy Court on February 28, 2011 as Docket Number 10073. In response to the Objection, CC Springs states as

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follows:

1. In the Objection, the Liquidating Trust objects to CC Springs' claim on the basis that amounts included therein were previously settled. The Objection claims that CC Springs filed claim number 12333 on April 22, 2009 in the amount of \$562,886.75, in addition to an unliquidated amount of administrative expenses. Under the proposed Order claim number 12333 is reduced by \$18,234.14 of post-petition taxes and \$27,586.85 of stub rent as settled in claim number 13190. CC Springs does not seek to be paid twice, but does object to any further reduction of its claim.

2. CC Springs, in fact, filed claim number 12333 in the total amount of \$593,633.25, designating \$30,746.51 as an administrative priority claim and reserving its rights to assert administrative priority for post-petition rent. Claim number 13190 does not represent an independent proof of claim filed by CC Springs, but rather represents a portion of the relief sought in CC Springs' Amended Application for Administrative Expense filed on May 29, 2009 as Docket Number 3483. The Amended Application for Administrative Expense was resolved confidentially. Therefore, CC Springs does not object to the reduction of claim number 12333 by any duplicative amounts, so long as the terms of the confidential resolution are honored. CC Springs' consent to the disallowance of any amounts which are duplicative does not have, and should not be construed to have, the effect of negating its total claim in the amount of \$593,633.25, plus any remaining unliquidated amounts pursuant to the confidential settlement, and less any amounts already paid.

3. CC Springs opposes the Objection only to the extent that it seeks to reduce the total value of CC Springs' claim.

WHEREFORE, CC Springs, L.L.C., a Delaware limited liability company, prays that claim number 12333 be allowed in the amount of \$593,633.25 (plus any remaining unliquidated amounts, less any amounts already paid, and including administrative priority as part of the parties' confidential resolution), that the Objection be overruled to the extent it seeks to disallow or further reduce this claim, and for such other and further relief as appropriate.

Dated: April 7, 2011

CC SPRINGS, L.L.C.

By: /s/ Paul K. Campsen
Of Counsel

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CERTIFICATE OF SERVICE

I certify that on this 7th day of April, 2011, a true copy of the foregoing pleading was served electronically upon all parties receiving notice via ECF and via electronic mail and U.S. Mail to the following counsel for the Liquidating Trust:

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